

REMARKS/ARGUMENTS

As noted above, claims 1, 8, 13, 14 and 26 are amended, claims 2, 6, 10-12, 27, 29-31, 33, 35, 38, 39, 41-43, 45 and 47 are canceled, and claims 48-50 are added. The claim amendments are supported throughout the Specification (*See, e.g.*, paragraphs 0033, 0039, 0040 and Figs. 3-5). Thus, claims 1, 3-5, 7-9, 13, 14, 26, 28, 32, 34, 36, 37, 40, 44, 46 and 48-50 are now pending.

Claim Rejections – 35 USC § 112

Claims 1, 8, 11, 13 and 14 are rejected under 35 USC §112, second paragraph, for the term “deployable” being relative, and thus indefinite. Claim 11 is canceled, and claims 1, 8, 13 and 14 are amended to recited that the keyboard assembly is deployable relative to a housing and/or display, thereby overcoming the rejection and now fulfilling the requirements of 35 U.S.C. §112, second paragraph.

Thus, based on the foregoing, claims 1, 8, 13 and 14 fulfill the requirements of 35 U.S.C. §112, second paragraph, and withdrawal of the rejection of the claims under 35 U.S.C. §112, second paragraph, is respectfully requested.

Claim Rejections – 35 USC § 102

Claims 1, 3-6 and 38-39 are rejected under 35 USC § 102(e) as being anticipated by Jellicoe (U.S. Patent No. 7,107,018). Applicants respectfully traverse this rejection.

As noted above, claims 2, 6, 38 and 39 are canceled, and thus their rejection is moot.

Independent claim 1 is patentable over the cited references, as there is no combination of the cited references that discloses or suggests the recited first and second connectors respectively slidably connecting the housing, the first keyboard and the second keyboard, wherein the first and second connector are respectively disposed on the first keyboard top surface and the second keyboard top surface.

In contrast to the connectors disposed on the respective top surfaces, Jellicoe discloses “cooperating slides arranged on the widthwise-extending *edges* of the front housing 12 and second keypad housing 16” (Jellicoe, col. 4, lines 17-20; emphasis added) and “cooperating slides arranged on the widthwise-extending *edges* of the first 14 and second 16 keypad housings” (*Id.* at lines 26-28; emphasis added). An *edge* is clearly different from the recited “top surfaces.”

Moreover, Jellicoe does not suggest any other arrangement of the cooperating slides. Additionally, Jellicoe teaches against a top surface attachment of the connectors based on the disclosed arrangement of the device 10 in Fig. 2, of Jellicoe, wherein a QWERTY keyboard is exposed, and virtually the entire top surface of the QWERTY keyboard is used by the keys.

Further, it would not be obvious to dispose the connectors on the top surfaces of the keyboards, as a typical goal is to maximize the size of the keys on the top surfaces, as evidenced by the edgewise connections, and the arrangement of Fig. 2, as disclosed by Jellicoe.

Any attempt to add Lenchik fails to solve the deficiencies of Jellicoe. First, any proposed combination of Lenchik with Jellicoe to disclose the recited subject matter is inappropriate. As such, a combination would violate the principle of operation of Lenchik and Jellicoe. In particular, Jellicoe discloses a *sliding* connection provided by a *plurality of edgewise* C-shaped guides 30, 32 (or tongue and groove arrangements) between the housing and keypads, whereas Lenchik discloses a *rotating* connection provided by a *single* joint 12. Thus, the method of connecting the various components of Jellicoe and Lenchik are completely different and non-compatible. Second, even if Lenchik could be properly combined with Jellicoe, Lenchik still fails to disclose or suggest the recited connectors disposed on the respective top surfaces. Instead, Lenchik, like Jellicoe, discloses a connection on an edge. Thus, the combination of Jellicoe and Lenchik fails to disclose or suggest the subject matter recited by claim 1.

Claims 3-5, 7, 26, 36 and 37 depend from claim 1, and are thus are likewise allowable for at least the same reasons.

Therefore, for at least the reasons above, claims 1, 3-5, 7, 26, 36 and 37 are patentable over the cited references, and respectfully request that the Examiner withdraw their rejection under 35 USC § 102(e) as being anticipated by Jellicoe.

Claim Rejections – 35 USC § 103

Claims 7-11, 13, 14, 26-37 and 40-47 are rejected under 35 USC § 103(e) as being obvious over Jellicoe (U.S. Patent No. 7,107,018) in view of Lenchik (U.S. Patent No. 6,658,272). Applicants respectfully traverse this rejection.

As noted above, claims 10, 11, 27, 29-31, 33, 35, 41-43, 45 and 47 are canceled, and thus their rejection is moot.

Independent claims 8, 13, and 14 are patentable over the cited references, as there is no combination of the cited references that discloses or suggests the recited action of or means for presenting information on the display rotated for viewing 90 degrees from the numerical keys, wherein the presenting is based on a command of an operating application using the numerical keys during deployment of the first key arrangement.

In contrast to the recited subject matter, where the presented information is rotated for viewing 90 degrees from the deployed keys, both Jellicoe and Lenchik teach presenting information for viewing at the same angle as the exposed keys. In particular, Jellicoe teaches that “display panel 22 automatically displays the characters on the display panel 22 *in the same orientation and direction* as the keys on the exposed keypad (15 or 17).” (Jellicoe, col. 3, lines 56-58; emphasis added; and *see, e.g.*, Figs 2-3). Similarly, Lenchik teaches that “[b]ecause of this ability to determine the relative positions, *both the display device 120 and the inputs 115* may be configured by the portable electronic device 100 *into either a landscape mode or a portrait mode.*” (Lenchik, col. 4, lines 12-15; emphasis added). For example, Lenchik discloses “[b]ecause the display 120 is therefore positioned like a portrait of a person, it is known as a portrait mode. The portrait configuration is also reflected in the inputs 115 of the second element 106, which may be configured to reflect the portrait mode and may include numeric keys and other phone keys.” (*Id.* at col. 3, lines 3-8). Thus, both Jellicoe and Lenchik teach orienting the information on the display in the same orientation and direction of the exposed keys, which is different from the recited action of or means for presenting information on the display rotated for viewing 90 degrees from the numerical keys, wherein the presenting is based on a command of an operating application using the numerical keys during deployment of the first key arrangement.

Additionally, the recited subject matter is not obvious, as it is counter-intuitive to present information for viewing at 90 degrees from deployed keys used by an operating application. Such non-obvious is supported by Jellicoe and Lenchik, which teach highly configurable devices, but which strictly teach away from any other configuration other than orienting the information on the display in the same orientation and direction of the exposed keys.

Thus, independent claims 8, 13 and 14 are patentable over any combination of the cited references.

Claims 9 and 40 depend from claim 1, claims 28, 32 and 44 depend from claim 13, and claims 34 and 46 depend from claim 14, are thus are likewise allowable for at least the same reasons.

Therefore, for at least the reasons above, claims 8, 9, 13, 14, 28, 32, 34, 40, 44 and 46 are patentable over the cited references, and respectfully request that the Examiner withdraw their rejection under 35 USC § 103(a) as being obvious over Jellicoe and Lenchik.

New Claims

Applicants have added new claims 48-50 to recite subject matter to which they are entitled. As noted above, these new claims are fully supported throughout the Specification.

Additionally, claims 48-50 are allowable, as there is no combination of the cited references that discloses or suggests the subject matter recited by these claims.

In particular, claims 48-50 respectively depend from independent claim 1, which is believed to be patentable over any combination of the cited references, as discussed above. Thus, for at least the same reasons, claims 48-50 are also non-obvious and patentably distinguishable over the cited prior art references. (MPEP 2143.03). Further, each of these claims separately recites subject matter not disclosed or suggested by any combination of the cited references. For example, there is no combination of the cited references that discloses or suggests the orientation of the presented information relative to the deployed keyboard, as recited by claim 50, and as discussed above with respect to independent claims 8, 13 and 14.

Therefore, Applicants respectfully request that the Examiner allow claims 48-50.

CONCLUSION

In light of the remarks contained herein, Applicants submit that the application is in condition for allowance, for which early action is requested.

Please charge any fees or overpayments that may be due with this response to Deposit Account No. 17-0026.

Respectfully submitted,

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